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10 Attorney for Defendant
11 JOSE LUIS RAMOS

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00225-WBS
12 Plaintiff,)
13 v.) STIPULATION AND ORDER TO
14 JOSE LUIS RAMOS,) CONVERT STATUS CONFERENCE TO
15 Defendant.) CHANGE OF PLEA AND CONTINUE TO
16) MAY 6, 2024 AND EXCLUDE TIME
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IT IS HEREBY STIPULATED, by and between the parties, through their respective
counsel, Assistant United States Attorney Cameron Desmond, counsel for plaintiff, and Assistant
Federal Defender Megan T. Hopkins, counsel for defendant Jose Luis Ramos, that the status
conference scheduled for March 11, 2024, be converted to a change of plea hearing and
continued to **May 6, 2024, at 9:00 a.m.**

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Government counsel has provided the Mr. Ramos with a written plea offer in this case,
which the parties are working to execute. Additionally, the defense is conducting ongoing
investigation, which requires legal research, witness interviews and the potential need to identify
an expert, as well as engaging in reciprocal exchange of discovery. The requested continuance
will allow for the time necessary for the defense to conduct its investigation and for the parties to
execute the plea agreement.

Accordingly, the parties request that the status conference in this matter be reset for May 6, 2024. The parties agree that the ends of justice served by resetting the status conference date outweigh the best interest of the public and the defendant in a speedy trial. Therefore, the parties agree that time is excludable from March 11, 2024 through May 6, 2024, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

Dated: March 6, 2024

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Public Defender

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for Defendant
JOSE LUIS RAMOS

Dated: March 6, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Cameron Desmond
CAMERON DESMOND
Assistant United States Attorneys
Attorneys for Plaintiff

ORDER

IT IS HEREBY ORDERED that the status conference scheduled for March 11, 2024, at 9:00 a.m. is continued to **May 6, 2024, at 9:00 a.m.** and converted to a change of plea hearing. The time period between March 11, 2024 and May 6, 2024 is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: March 7, 2024

William B. Shubb
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE